REMARKS/ARGUMENTS

Claims 1 and 3-38 are currently pending in this application. Claims 1 and 3-15 have been amended. Claim 2 has been canceled. Claims 16-38 have been added. The amendments find full support in the original specification, claims, and drawings. No new matter has been added. In view of the above amendments and remarks that follow, reconsideration, reexamination, and an early indication of allowance of claims 1 and 3-38 are respectfully requested.

The Examiner rejects claims 2 and 9 because of certain informalities. The Examiner also rejects claims 1-7 under 35 U.S.C. 112, first paragraph, as failing to comply with the enablement requirement. The Examiner further rejects claims 1-15 under 35 U.S.C. 112, second paragraph, as being indefinite for failing to particular point out and distinctly claim the subject matter which applicant regards as the invention. Applicant submits that the amendments to claims 1 and 3-15, and the cancellation of claim 2, obviates these rejections. Applicant therefore respectfully requests withdrawal of the objections to claims 2 and 9 and the withdrawal of the rejections under 35 U.S.C. 112, first and second paragraphs.

Claims 1-7 are rejected under 35 U.S.C. 103(a) as being unpatentable over Zellweger (U.S. Patent No. 6,144,968) in view of May et al. (U.S. Patent No. 5,544,354). Claims 8-15 are rejected under 35 U.S.C. 103(a) as being unpatentable over Zellweger in view of May, and further in view of Ambroziak (U.S. Patent No. 6,415,319). Applicant respectfully traverses these rejections.

Zellweger discloses a method and apparatus for menu access to information based on hierarchically oriented keywords. Keywords may occupy a top or bottom (leaf) of the hierarchical ordering. (See, Col. 3, lines 40-44; Col. 4, lines 32-34) (Emphasis added). The structure in Zellweger used to organize the keywords is therefore nothing more than a tree-type structure that has a top and a bottom. When a keyword associated with a particular topic (e.g. "Pontiac") is selected from a menu display of keywords in Zellweger, additional keywords are displayed in a next level menu display that belong to the particular topic (e.g. "Bonneville Series," "Grand Prix series," or "Le Mans Series"). (See, FIGS. 4a-4b). Nothing in Zellweger indicates that the additional keywords is ordered in any particular way based on their relationship to the selected keyword.

May discloses a database that is hierarchically arranged using matrices containing cells, where the individual cells in the matrices are associated with matrices in lower levels of the database. Nothing in May indicates that the matrices in the lower levels of the database are ordered in any particular way based on their relationship to a selected matrix in a higher level.

Ambroziak discloses an intelligent network browser that extracts conceptual information from a document, analyzes the extracted conceptual information, and assimilates the conceptual information into an index. Users may browse and query the index by entering a concept (e.g. "cryptography") to view in the index. The browser displays in a concept browser a portion of

the index with the entered concept (e.g. "cryptography") as the most general concept (i.e. at the root) with the more specific concepts branched below. (See, FIGS. 12 and 14). Thus, Ambroziak also discloses a tree-type structure for ordering the index. Furthermore, nothing in Ambroziak indicates that the more specific concepts related to the entered general concept are ordered in any particular way based on their relationship to the entered general concept.

In marked contrast, claim 1 has been amended to recite:

> "A content indexing structure comprising:
>
> a first indexing level having a plurality of first level content indexes connected in a substantially circular manner, one of the first level content indexes representing a particular category associated with a particular feature; and
>
> a second indexing level having a plurality of second level content indexes, each of the second level content indexes having a weighing value indicative of an association with the first level content index representing the particular category, the plurality of second level content indexes being arranged in a substantially circular manner according to the weighing value." (Emphasis Added).

Claim 8 has similarly been amended to recite:

> "A contents display system comprising: . . . a contents features analyzer for analyzing features of at least one content provided from a media source . . ., wherein indexes are generated according to a content indexing structure based on the analyzed features, the content indexing structure including:
>
> a first indexing level having a plurality of first level content indexes connected in a substantially circular manner, one of the first level content indexes representing a particular category associated with a particular feature; and

> a second indexing level having a plurality of second level content indexes, each of the second level content indexes having a weighing value indicative of an association with the first level content index representing the particular category, the plurality of second level content indexes being arranged in a substantially circular manner according to the weighing value." (Emphasis added).

Nothing in Zellweger, May, or Ambroziak teach or suggest the limitations of claim 1 or 8. Accordingly, claims 1 and 8 are now in condition for allowance.

Claims 3-7 and 9-15 are also in condition for allowance because they depend on an allowable base claim, and for the additional limitations contained therein.

Claims 16-38 are new in this application. Applicant submits that these claims are also in condition for allowance because none of the cited references teach or suggest the limitations recited in these claims.

In view of the above amendments and remarks, Applicant respectfully requests an early indication of allowance of claims 1 and 3-38 now pending in this application.

Respectfully submitted,
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